

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

FNU LNU,
a/k/a "Enrique," and
LEOBARDO CISNEROS-MAGANA,
a/k/a "Compadre,"

Defendants.

SEALED INDICTMENT

07 Cr. _____

07 CRIM. 482

COUNT ONE

The Grand Jury charges:

1. From in or about February 2007 until at least on or about May 23, 2007, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Enrique," and LEOBARDO CISNEROS-MAGANA, a/k/a "Compadre," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FNU LNU, a/k/a "Enrique" and LEOBARDO CISNEROS-MAGANA, a/k/a "Compadre," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1) and 841(b)(1)(A) of Title

21, United States Code.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 9, 2007, FNU LNU, a/k/a "Enrique," and LEOBARDO CISNEROS-MAGANA, a/k/a "Compadre," the defendants, in Illinois, discussed the sale of up to 100 kilograms of cocaine and the distribution of approximately 7 kilograms.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, FNU LNU, a/k/a "Enrique," and LEOBARDO CISNEROS-MAGANA, a/k/a "Compadre," the defendants, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting and derived from any proceeds that FNU LNU, a/k/a "Enrique" and LEOBARDO CISNEROS-MAGANA, a/k/a "Compadre," the defendants, obtained directly and indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including, but not limited to,

the following:

a. Money Judgment

A sum of money equal to approximately \$240,000 in United States currency, representing the amount of proceeds obtained as a result of the offenses, distribution of controlled substances and the conspiracy to distribute controlled substances.

b. Conveyance

One Acura 3.2 CLS coupe vehicle, Illinois License No. 47177, registered to Luis E. Rivera Vega.

Substitute Assets Provision

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant--

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty; it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the

defendants up to the value of the forfeitable property.

(Title 21, United States Code, Sections 841(a)(1),
846 and 853.)

Robert H. Long
Frederick

Michael J. Garcia

MICHAEL J. GARCIA
United States Attorney

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Defendants.

INFORMATION

07 Cr. _____

(Title 21, United States Code,
Section 846.)

MICHAEL J. GARCIA
United States Attorney.

Robert F. Long

5/30/07 TLC: Post 11/1/87 indictment filed.
A/Us ordered.

Peck, M.J.